REMARKS

Claims 1-20 are currently pending. Claims 1-2 and 11-12 have been amended, without prejudice to pursue the original claims in a related application. No new matter has been added.

Claims Rejections under 35 USC §112

In the Action, claims 2-3 and 12-13 were rejected under 35 USC §112, second paragraph, for indefinite subject matter.

In response, claims 2 and 12 have been amended to overcome the rejections under 35 USC §112. Thus, Applicants respectfully request reconsideration of the claims, as amended, and withdrawal of the rejections under 35 USC §112.

Claims Rejections under 35 USC §102(b) and 35 USC §103(a)

In the Action, claims 1-7, 11-14, and 17-20 were rejected under 35 USC §102(b) as anticipated by Fukutoku (US 2001-0004253), claims 8-9 and 16 were rejected under 35 USC §103(a) as unpatentable over Fukutoku in view of Clark (US 3,925,777), and claims 10 and 15 were rejected under 35 USC §103(a) as unpatentable over Fukutoku in view of Baron (US 3,740,743).

In response, Applicant asserts that these references, alone or in combination, do not disclose or even suggest each and every limitation of the present claims.

For example, amended independent claim 1 recites the following limitations (*emphasis added*):

> wherein the signal controller changes an inversion type when dot blocks are repeated in a predetermined pattern, *each dot block includes at least two successive pairs of adjacent two pixels included in at least one color pixel among the first to third color pixels*, and a magnitude of difference in gray between two pixels in each pair is equal to or larger than a critical value.

Referring to Fukutoku, when a pattern in which the difference between grays corresponding to the same color of two adjacent pixels is greater than a critical value

exists, Fukutoku determines whether the flicker occurs by detecting whether the pattern is repeated a predetermined number of times. Fukutoku changes an inversion type when the flicker occurs. However, Fukutoku does not teach that the plurality of pixels are grouped into a block, and Fukutoku merely teaches that the flicker pattern is determined by using the difference between the grays of two adjacent pixels. Accordingly, Fukutoku fails to disclose that detection is performed by the block and the flicker pattern is determined by the number of blocks which are greater than the critical value.

In contrast, presently amended independent claim 1 recites, "wherein the signal controller changes an inversion type when dot blocks are repeated in a predetermined pattern, each dot block includes at least two successive pairs of adjacent two pixels included in at least one color pixel among the first to third color pixels, and a magnitude of difference in gray between two pixels in each pair is equal to or larger than a critical value." In reference to Figs. 1-3 and page 5, line 4 to page 7, line 19, the present specification discloses grouping a plurality of pixels into a block, counting a dot block by performing the detection by the block, and determining a flicker pattern when the number of dot blocks is greater than the critical value.

The ancillary Clark and Baron references fail to remedy the deficiencies of Fukutoku. E.g., Clark is merely relied for purportedly disclosing a counter that counts clock signals, and Baron is merely relied for purportedly disclosing counting rows by utilizing synchronization signals as input into counters.

Therefore, since the cited Fukutoku reference fails to disclose or even suggest each and every limitation of amended claim 1, and the ancillary Clark and Baron references fail to remedy the deficiencies of Fukutoku, present independent claim 1, as amended, and dependent claims 2-10 are considered to be in condition for allowance, and such allowance is respectively requested.

Moreover, independent claim 11 has been amended in a similar manner as with claim 1 and is therefore, in view of the reasons discussed above in reference to claim 1, considered to be in condition for allowance along with dependent claims 12-20, and such allowance is respectively requested.
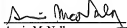
CONCLUSION

For the foregoing reasons, Applicants respectfully submit that the pending claims are in condition for allowance. Reconsideration and withdrawal of the rejections are respectfully requested and a timely Notice of Allowance is solicited.

If there are any questions regarding any aspect of the application, please call the undersigned at (949) 752-7040.

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